Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Twelfth Annual Report and Analysis of	)	WT Docket No. 07-71
Competitive Market Conditions with Respect	)	
to Commercial Mobile Services	)	

COMMENTS OF INMARSAT VENTURES LIMITED

Inmarsat Ventures Limited ("Inmarsat") submits these Comments in response to the Public Notice inviting input to be reflected in the Commission's Twelfth Annual Report on commercial mobile radio service ("CMRS") competition.[1] In particular, Inmarsat responds to the Commission's request for information about "the current provision of CMRS by MSS companies."[2]

Through its mobile satellite service ("MSS") system, and a network of third party distributors and service providers, Inmarsat provides a wide range of mobile communications offerings to the United States, including services that fall within the definition of CMRS (*i.e.*, mobile telecommunications provided on a common carrier basis), as well as those that do not (*i.e.*, private carriage services and information services).[3] These offerings serve the mobile communications needs of end users, whether they are within or beyond the reach of the terrestrial communications network, and whether they are on land, at sea, or in the air.

Inmarsat initially was established to provide maritime services. Its service offerings evolved first to meet aeronautical communications needs, and, more recently, to serve

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1 Public Notice, *WTB Seeks Comment on CMRS Market Competition*, WT Docket No. 07-71, DA 07-1371 (rel. Apr. 6, 2007) ("Public Notice").

2 *Id.* at 4.

3 Inmarsat, itself, does not provide any services directly to end users.

land-mobile users as well. In the past few years, Inmarsat's investment and innovation in land-mobile services have accelerated, leading to the introduction of new services that support higher data rates, employ smaller, less expensive, and more portable terminals, and offer greater mobility and flexibility than ever before. As detailed below, Inmarsat soon will introduce a hand-held terminal, with the form factor of a cellular phone, that allows communication with both the Inmarsat satellite network, as well as with traditional CMRS networks (*i.e.*, cellular and PCS).

Governments, companies and individuals use the Inmarsat system for a wide variety of communications needs, including Internet access, voice communications, networking, navigation, distress messaging, search and rescue, asset monitoring and tracking, and news gathering and reporting. Examples of the users who rely on Inmarsat include CNN, ABC, CBS, NPR, nearly every major airline and shipping line, the oil and gas industry, the U.S. military, the Department of Homeland Security (including FEMA and the Coast Guard), U.S. Executive Branch and Congressional officials, the New York City Fire Department, and the Red Cross. When highly secure communications are needed, when users need connectivity wherever they may travel, and when weather or disaster precludes the use of terrestrial networks, Inmarsat's MSS system provides a vital, instantaneously-available, and reliable link for individual, commercial and governmental users alike.

Inmarsat continues to expand its capabilities and service offerings, and has invested well over $1.5 billion in the deployment of the new Inmarsat 4 ("I-4") satellite network, which provides innovative MSS services on the most advanced commercial communications satellites now in orbit. Two of these I-4 satellites are now providing service, including one serving the United States since early 2006. A third I-4 satellite, which is fully constructed and

tested, will be launched and positioned to serve the United States as well, as soon as launch arrangements are finalized.

Inmarsat's I-4 fleet supports a new class of innovative IP-based communications, including the Broadband Global Area Network ("BGAN") service. BGAN was introduced in the United States in 2006 as a land-mobile service. Using highly portable and easily deployed "notebook sized" antennas that are one-third the size, weight, and price of traditional Inmarsat terminals, BGAN provides voice and broadband service at speeds of almost half a megabit per second. Equally important, BGAN is easy to set up and use. After plugging a BGAN antenna into any laptop computer with a standard USB cable (or using a Bluetooth or Wi-Fi connection), mobile users of all types can have immediate voice and data connectivity. Inmarsat will soon expand its broadband offerings via the forthcoming SwiftBroadband and FleetBroadband services, which use terminals optimized for aeronautical and maritime users.

BGAN offers unique advantages when the terrestrial network becomes unreliable or fails. For example, in the wake of a natural or other disaster, the small BGAN terminals provide a highly portable communications link to support individual first responders and mobile command posts. In fact, a single BGAN terminal with Wi-Fi capability supports wireless voice and high-speed broadband service to *ten* first responder users in the vicinity of the terminal. Because it is compatible with other IP-based technologies, BGAN today provides a technological solution to the pressing problem of first responder interoperability. A BGAN terminal connected to a portable cell phone tower can quickly re-establish communications among first responders over their existing mobile phones while the terrestrial network is being restored. Similar solutions are available to support the continued use of existing land mobile radios when use of the terrestrial radio towers is disrupted.

Inmarsat continues to innovate, in an effort to provide greater mobility to CMRS users at a lower price. To that end, Inmarsat has teamed with ACeS International Limited ("ACeS"), a leading hand-held voice services provider in Asia, to extend its hand-held services to large portions of Africa, the Middle East and a much wider region in Asia using the ACeS R190 handset and the I-4 spacecraft, starting in mid-2007. The ACeS R190 handset, weighing about 7 ounces, and with a form factor similar to contemporary cellular/PCS phones, is a dual mode device that supports both MSS and GSM service. The service offering is expected to be available on both a pre-paid and a subscription basis. Inmarsat is also in the advanced stages of implementing the next generation of hand-held services with global coverage and using the latest generation handset technology. Inmarsat anticipates that this new service and state-of-the-art MSS/GSM hand-held terminal will be available in the United States starting in late 2008. After launching voice service with this new hand-held device, Inmarsat expects to phase-in service enhancements that will include IP data and push-to-talk capabilities.

As with other current and future MSS providers in the United States, Inmarsat faces growing competition from operators of fixed satellite service ("FSS") spacecraft, which increasingly provide "mobile" services. With spectrum deregulation and advances in antenna technology, FSS providers are now able to provide many mobile voice and data solutions that once were provided on a broad scale only by MSS and other mobile service providers. In fact, small FSS VSAT terminals are now being deployed on ships and airplanes to provide voice and broadband connectivity to passengers and crews,[4] and initiatives are underway to increase the ability of FSS providers to provide service to vehicles of various types.[5] Thus, both deregulation

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[4] *See, e.g.*, *The Boeing Company*, 16 FCC Rcd 22645 (2001).

[5] General Dynamics Corporation, Petition for Rulemaking, RM-11336 (filed May 24, 2006).

and technological advances have made the marketplace for mobile communications services even more competitive than it has been for years.

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Inmarsat respectfully submits the above information to assist the Commission in preparing its Twelfth Annual Report on CMRS competition.

Respectfully submitted,

/s/

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